

C. D. Michel – SBN 144258
cmichel@michellawyers.com
Sean A. Brady – SBN 262007
sbrady@michellawyers.com
Matthew D. Cubeiro – SBN 291519
mcubeiro@michellawyers.com
Konstadinos T. Moros – SBN 306610
kmoros@michellawyers.com
MICHEL & ASSOCIATES, P.C.
180 East Ocean Boulevard, Suite 200
Long Beach, CA 90802
Telephone: 562-216-4444
Facsimile: 562-216-4445

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

STEVEN RUPP, et al.,

Plaintiffs,

vs.

ROB BONTA, in his official capacity as
Attorney General of the State of
California,

Defendant.

Case No.: 8:17-cv-00746-JLS-JDE

**JOINT STIPULATION AND
REQUEST TO CONTINUE
PRETRIAL DEADLINES**

Action Filed: April 24, 2017

1 Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Local Rule 7-1,
2 Plaintiffs Steven Rupp, Steven Dember, Cheryl Johnson, Michael Jones, Christopher
3 Seifert, Alfonso Valencia, Troy Willis, Dennis Martin, and the California Rifle &
4 Pistol Association, Incorporated, (collectively “Plaintiffs”) and Defendant Rob
5 Bonta, in his official capacity as Attorney General of the State of California
6 (“Defendant”) (together with Plaintiffs, “the Parties”), through their respective
7 attorneys of record, hereby stipulate and request as follows:

8 WHEREAS, the Parties have filed respective Motions for Summary Judgment
9 (Dkt. 149, 150);

10 WHEREAS, on September 8, 2023, the Court heard argument on the Parties’
11 motions for summary judgment and took the motions under submission (Dkt. 160);

12 WHEREAS, on October 5, 2023, the Parties requested a continuance of
13 certain pretrial deadlines by approximately two months (Dkt. 164), which the Court
14 granted (Dkt. 166);

15 WHEREAS, on December 4, 2023, the Parties requested a second
16 continuance of certain pretrial deadlines by approximately two months (Dkt. 168),
17 which the Court granted (Dkt. 169);

18 WHEREAS, the current scheduling order provides that the deadline to file
19 motions in limine is set for February 9, 2024, and the Final Pretrial Conference is set
20 for March 8, 2024;

21 WHEREAS, the granting of either of the Parties’ motions for summary
22 judgment would fully resolve all claims in this action and render moot existing
23 pretrial deadlines;

24 WHEREAS, any other decision of the Court on the pending motions for
25 summary judgment may provide helpful guidance to the Parties in preparing their
26 pretrial documents, including by narrowing the issues of law and fact for trial;

27 WHEREAS, the Parties have met and conferred on the need to continue the
28 pretrial deadlines and agree that it is in the best interest of the Parties and the Court

1 to further continue the pretrial deadlines; and

2 WHEREAS, the Parties agree that good cause exists to continue the pretrial
3 deadlines by an additional period of approximately sixty (60) days;

4 NOW, THEREFORE, the Parties hereby stipulate and jointly request that:

5 1. The Court continue the deadline to file motions in limine currently set
6 for February 9, 2024, to April 9, 2024.

7 2. The Court continue the Final Pretrial Conference currently set for
8 March 8, 2024, at 10:30 a.m., to May 9, 2024, at 10:30 a.m.

9 **IT IS SO STIPULATED.**

10
11 Dated: February 2, 2024

MICHEL & ASSOCIATES, P.C.

12 *s/ Sean A. Brady*

13 Sean A. Brady
Attorneys for Plaintiffs

14 Dated: February 2, 2024

15 ROB BONTA
Attorney General of California
16 R. MATTHEW WISE
Supervising Deputy Attorney General
17 ANNA FERRARI
CHRISTINA R.B. LOPEZ
18 Deputy Attorneys General

19 *s/ John D. Echeverria*

20 JOHN D. ECHEVERRIA
Deputy Attorney General
21 Attorney for Defendant
22
23
24
25
26
27
28

ATTESTATION OF E-FILED SIGNATURES

I, Sean A. Brady, am the ECF User whose ID and password are being used to file this JOINT STIPULATION AND REQUEST TO CONTINUE PRETRIAL DEADLINES. In compliance with Central District of California L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have concurred in this filing.

Dated: February 2, 2024

s/ Sean A. Brady

Sean A. Brady

CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

Case Name: *Rupp, et al. v. Bonta*
Case No.: 8:17-cv-00746-JLS-JDE

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

JOINT STIPULATION AND REQUEST TO CONTINUE PRETRIAL DEADLINES

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Xavier Becerra
Attorney General of California
Anna Ferrari
Deputy Attorney General
Email: anna.ferrari@doj.ca.gov
Christina R.B. Lopez
Email: christina.lopez@doj.ca.gov
John D. Echeverria
Email: john.echeverria@doj.ca.gov
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102

I declare under penalty of perjury that the foregoing is true and correct.

Executed February 2, 2024.


Laura Palmerin